

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

DALLAS DIVISION

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JENNIFER L. RYAN,

Plaintiff,

v.

CIVIL ACTION NO.

UNITED STATES DEPARTMENT OF JUSTICE

3:25-CV-00325-X-BT

and KAREN E. ROCHLIN,

Defendants.

PLAINTIFF'S MOTION FOR SUBSTITUTE SERVICE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff Jennifer L. Ryan, proceeding pro se, and respectfully moves this Court to authorize substitute service on Defendant Karen E. Rochlin pursuant to Federal Rule of Civil Procedure 4(e)(1) and Florida Rule of Civil Procedure 1.070(i), as permitted by Fed. R. Civ. P. 4(e)(1). In support thereof, Plaintiff states as follows:

1. **Defendant's Known Address:** Defendant Karen E. Rochlin's last known usual place of abode is 1900 Purdy Ave, Apt. 1408, Miami Beach, FL 33139, as evidenced by multiple records, including Florida driver's license data and recent address verification reports (Exhibit 2, incorporated by reference).
2. **Failed Service Attempts:** Plaintiff has diligently attempted to personally serve Defendant Rochlin at the above address on six separate occasions between March 15, 2025, and March 26, 2025, without success. These attempts are detailed in the Affidavit of Daisy Lopez, Plaintiff's process server (Exhibit 1, attached and incorporated by reference). Notable findings include:

- No answer at the address despite multiple visits at varying times.

- A concierge at the property confirmed Rochlin resides there but suggested she is avoiding service (Exhibit 1, March 17, 2025 entry).

3. Request for Substitute Service: Due to the repeated failure to effect personal service, despite evidence that 1900 Purdy Ave, Apt. 1408 is Defendant Rochlin's residence, Plaintiff requests authorization to serve her by alternative means reasonably calculated to provide notice, as permitted under Fed. R. Civ. P. 4(e)(1) and Fla. R. Civ. P. 1.070(i). Specifically, Plaintiff proposes one of the following methods:

- Delivering a true copy of the Summons, Complaint (titled "Petition for Redress of Grievances and Damages Arising from Wrongful Prosecution"), Civil Cover Sheet, and this Order (if granted) to any person over the age of sixteen (16) years at 1900 Purdy Ave, Apt. 1408, Miami Beach, FL 33139; **OR**
- Securely attaching a true copy of the Summons, Complaint, Civil Cover Sheet, and this Order (if granted) to the front door or primary entryway at 1900 Purdy Ave, Apt. 1408, Miami Beach, FL 33139, or, if access is restricted by a gate, securely attaching the documents to the gate at said address.

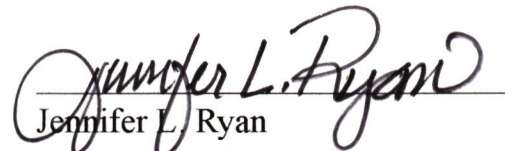
4. Reasonable Effectiveness: Plaintiff asserts that the requested methods are reasonably effective to give Defendant Rochlin notice of this lawsuit. The address is confirmed as her residence by recent records (Exhibit 2), and the concierge's statement (Exhibit 1) indicates she is present but evading service. Service by delivery to an occupant or posting at her door satisfies due process under Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306 (1950).

5. Supporting Evidence: Attached as Exhibit 1 is the Affidavit of Daisy Lopez, detailing the unsuccessful service attempts. Attached as Exhibit 2 is a compilation of address verification

Defendant's current residence.

WHEREFORE, Plaintiff respectfully requests that this Court grant this Motion for Substitute Service and issue an Order authorizing service on Defendant Karen E. Rochlin by one of the methods outlined above, along with any further relief the Court deems just and proper.

Respectfully submitted,



Jennifer L. Ryan
407 E. Tyler St.
Richardson, TX 75081
469-491-0587
jennaryanrealty@gmail.com

Pro Se Plaintiff

April 10, 2025

Attachments:

- Exhibit 1: Affidavit of Daisy Lopez
- Exhibit 2: Address Verification Records

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PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for Karen Rochlin
was recieved by me on 3/13/2025:

EXHIBIT # 1

- ☐ I personally served the summons on the individual at (place) on (date) ; or
- ☐ I left the summons at the individual's residence or usual place of abode with (name) , a person of suitable age and discretion who resides there, on , and mailed a copy to the individual's last known address; or
- ☐ I served the summons on (name of individual) , who is designated by law to accept service of process on behalf of (name of organization); or
- ☒ I returned the summons unexecuted because ; or
- ☐ Other (specify)

My fees are \$ 0 for travel and \$ 75.00 for services, for a total of \$ 75.00.

I declare under penalty of perjury that this information is true.

Date: 03/26/2025



Server's signature

Daisy Lopez

Printed name and title

634 sw 63 ave
Miami, FL 33144

Server's address

Additional information regarding attempted service, etc:

3/15/2025 2:49 PM: There was no answer at the address. I spoke with a neighbor who doesn't recognize name.
3/17/2025 1:08 PM: There was no answer at the address. I spoke with an on-site worker who says subject resides.
Concierge advised me that serveeives here. Avoiding service
3/19/2025 8:02 PM: There was no answer at the address.
3/22/2025 11:47 AM: There was no answer at the address.
3/24/2025 7:00 PM: There was no answer at the address.
3/26/2025 9:53 AM: There was no answer at the address.



Tracking #: 0163369126



Exhibits**EXHIBIT # 2****Defendant:** Karen Rochlin**Address:** 1900 Purdy Ave Apt 1408, Miami Beach, Miami-Dade County, FL 33139**CBC Innovis Search Results**

Address	Business Indicator	First Reported	Last Reported
1900 Purdy Ave Apt 1408, Miami Beach, FL 33139		04/04/2000	

Accurant Search Results

Address	Business Indicator	First Reported	Last Reported
1900 PURDY AVE APT 412, MIAMI BEACH, FL 33139-1400 (Verification Level: Premises Partial)	x	03/01/2013	03/01/2013
1900 PURDY 1507 AVE, MIAMI BEACH, FL 33139		05/01/2003	05/01/2003
1330 CONNECTICUT AVE NW, WASHINGTON, DC 20036 (Verification Level: Premises Partial)	x	10/01/2002	03/01/2010
1900 Purdy Ave Apt 1408, Miami Beach, FL 33139		01/01/1999	02/01/2025
1900 PURDY AVE APT P 412, MIAMI BEACH, FL 33139-1400 (Verification Level: Premises Partial)	x	01/01/1999	01/01/2006
1900 PURDY AVE UNIT P412, MIAMI BEACH, FL 33139-1400 (Verification Level: Premises Partial)	x	01/01/1997	01/01/2023
555 NE 34TH ST APT 2104, MIAMI, FL 33137		03/01/1989	01/01/2000
8 GARDEN ST APT, BOSTON, MA 02114-3709 (Verification Level: Street Partial)		02/01/1989	12/01/1990
8 GARDEN CT APT, CAMBRIDGE, MA 02138-1353 (Verification Level: Premises Partial)		02/01/1989	02/01/1989
1330 NEW HAMPSHIRE AVE NW APT 225, WASHINGTON, DC 20036-6350		01/01/1989	02/01/1998
225 NBR, WASHINGTON, DC 20036 (Verification Level: Street Partial)		04/01/1988	04/01/1988
8813 BRIERLY RD, CHEVY CHASE, MD 20815-4748		04/01/1985	04/01/1985

TLO Search Results

Address	Business Indicator	First Reported	Last Reported
1330 CONNECTICUT AVE NW, WASHINGTON, DC 20036 (Verification Level: Premises Partial)	x	06/08/2009	06/08/2009
1900 PURDY AVE OFC, MIAMI BEACH, FL 33139	x	08/01/2006	11/01/2011
1900 PURDY AVE PH 1, MIAMI BEACH, FL 33139		04/16/2003	04/16/2003
1900 PURDY AVE, MIAMI BEACH, FL 33139 (Verification Level: Premises Partial)	x	04/20/1999	01/01/2020
1900 Purdy Ave Apt 1408, Miami Beach, FL 33139		03/04/1999	03/11/2025
555 NE 34TH ST APT 2104, MIAMI, FL 33137		12/01/1992	11/24/1998
APOLLINE APT, 1330 NEW HAMPSHIRE AVE NW, WASHINGTON, DC 20036 (Verification Level: Premises Partial)	x	05/21/1990	05/21/1990
555 NE 34TH ST, MIAMI, FL 33137 (Verification Level: Premises Partial)	x	03/01/1989	09/26/2000
8 GARDEN ST, CAMBRIDGE, MA 02138	x	02/01/1989	02/01/1989

Exhibits

Drivers Licenses (TLO)

DL#: (redacted), **DL State:** FL, **Issued:** 10/12/1994, **Name:** KAREN ELIZABETH ROCHLIN, **Address:** 555 NE 34TH ST APT 2104, MIAMI, FL 33137, **DOB:** (redacted)

DL#: (redacted), **DL State:** FL, **Issued:** 03/15/1920, **Name:** KAREN ELIZABETH ROCHLIN, **Address:** 1900 PURDY AVE APT 1408, MIAMI BEACH, FL 33139, **DOB:** (redacted)

DL#: (redacted), **DL State:** FL, **Issued:** 03/08/2017, **Name:** KAREN ELIZABETH ROCHLIN, **Address:** 1900 PURDY AVE, MIAMI BEACH, FL 33139, **DOB:** (redacted)

DL#: (redacted), **DL State:** FL, **Issued:** 03/08/2017, **Name:** KAREN ELIZABETH ROCHLIN, **Address:** 1900 PURDY AVE APT 1408, MIAMI BEACH, FL 33139, **DOB:** (redacted)

DL#: (redacted), **DL State:** FL, **Issued:** 03/19/2009, **Name:** KAREN ELIZABETH ROCHLIN, **Address:** 1900 PURDY AVE APT 1408, MIAMI BEACH, FL 33139, **DOB:** (redacted)

DL#: (redacted), **DL State:** FL, **Issued:** 02/18/2005, **Name:** KAREN ELIZABETH ROCHLIN, **Address:** 1900 PURDY AVE APT 1408, MIAMI BEACH, FL 33139, **DOB:** (redacted)

Vehicles (TLO)

None reported.

Forwards reported per National Change of Address (NCOA) service

None reported.

Property Ownership (TLO)

None reported.

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and KAREN E. ROCHLIN,

Defendants.

ORDER GRANTING SUBSTITUTE SERVICE

On this day, the Court considered Plaintiff's Motion for Substitute Service. Having reviewed the motion and supporting affidavit, the Court finds that substitute service is warranted. IT IS THEREFORE ORDERED that Plaintiff may serve Defendant Karen E. Rochlin by [insert approved method from 3(a) or 3(b)].

SIGNED this ____ day of April, 2025.

UNITED STATES DISTRICT JUDGE